

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

STEPHANIE RISTOW

§

Plaintiff,

§

VS.

§

TEXAS LAUREL RIDGE
HOSPITAL, L.P., UHS OF DELAWARE,
INC. DBA UNIVERSAL HEALTH
SERVICES OF DELAWARE, INC., AND
RODNEY NORMAN

Civil Action No. 5:19-cv-1469

Defendants.

§

DEFENDANTS' UNOPPOSED MOTION TO
EXTEND TIME TO FILE INITIAL RESPONSIVE PLEADINGS

Defendants Texas Laurel Ridge Hospital, L.P., UHS of Delaware, Inc. dba Universal Health Services of Delaware, Inc., and Rodney Norman, (collectively “Defendants”) file this *Unopposed Motion to Extend Time to File Initial Responsive Pleadings* (“Motion”). In support, Defendants show the following:

1. Under the FEDERAL RULES OF CIVIL PROCEDURE, the current deadline for Defendant’s initial responsive pleading to Plaintiff’s *Complaint* is January 10, 2020.

2. Defendants are still in the process of investigating Plaintiff’s allegations in its *Complaint* and need a 14-day extension to prepare their initial responsive pleading.

3. Counsel for Defendants have conferred with Plaintiff’s counsel about this *Motion*. Plaintiff is unopposed to the relief sought by this *Motion*.

Requested Relief

Defendants request that the Court grant the requested extension and extend the deadline for Defendant’s initial responsive pleadings up to and including January 24, 2020. Defendants further

request that the Court find that any extension will not constitute a waiver of any jurisdictional or venue challenges including, but not limited to, any challenges made under FEDERAL RULES OF CIVIL PROCEDURE 4 or 12, 28 U.S.C. § 2201 or 28 U.S.C. § 1404, or any other potential defenses.

Prayer

Defendants respectfully request that the Court grant a 14-day extension, through January 24, 2020, to file their responsive pleadings to Plaintiff's *Complaint*.

Respectfully submitted,

LEWIS BRISBOIS BISGAARD AND SMITH, LLP

/s/ Tracy Graves Wolf

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HEALTH SERVICES OF DELAWARE, INC.,
and RODNEY NORMAN

CERTIFICATE OF CONFERENCE

I certify that I conferred with Plaintiff's counsel Allison Hartry on January 6, 2020, regarding the relief sought by this *Motion*. Ms. Hartry indicated that Plaintiff is unopposed to this *Motion*.

/s/ Tracy Graves Wolf

Tracy Graves Wolf

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served in accordance with the FEDERAL RULES OF CIVIL PROCEDURE on January 7, 2020, *via CM/ECF*, on the following:

Allison Hartry
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ATTORNEYS FOR PLAINTIFF

/s/ Brent Sedge
Brent Sedge